

CLOSURE PLAN CONTENTS AND TECHNICAL REVIEW

3.4 - DESCRIPTION OF HAZARDOUS WASTE CONSTITUENTS

The purpose of this section is to require the facility to summarize the hazardous constituents that may have been released or have the potential to be released to the surrounding containment area or surrounding soils from their regulated units.

The owner or operator of a hazardous waste management unit is responsible for identifying which hazardous waste constituents from those listed in CCR, Section 66261.126, Appendix VIII that may be present in their treatment and storage regulated units. To assist the permit writer in determining whether the appropriate hazardous waste constituents have been identified the first source of information is the waste analysis plan section of their Part B application if one exists. If there is no Part B, then similar type information must be provided by the owner or operator based on past operation of the regulated unit. Review of manifest records could help identify waste managed at the site. Degradation and reaction products of hazardous wastes and constituents contained in the unit and surrounding media should be determined and tested for. However, specific guidance is not available on determining what reaction products might be formed at this time.

The description of hazardous waste constituents is important because it will be used to determine if the appropriate analytical test methods will be used to detect these specific hazardous waste constituents. It also limits the hazardous constituents of concern to a much smaller number than the complete list of Appendix VIII constituents. Another way to limit the specific hazardous constituents of concern is to propose to conduct tests for classes of constituents such as metals, volatile and semi-volatile organics, pesticides, etc. If a specific class is not found, then tests for individual Appendix VIII constituents within the class need not be conducted. Also, where there are reliable and thorough records on wastes managed throughout the history of the unit, the constituents of concern can be limited to a specific class or constituents.

In those situations where multiple waste types are stored in the same bay or unit then a generic grouping, e.g., Total Organic Carbon (TOC), Total Petroleum Hydrocarbon (TPH), Semi-volatiles, Total Metals, Pesticides should be used rather than listing every hazardous constituent.

Key Questions

! Does the list of hazardous constituents cover the complete range of wastes that have been managed in the regulated units?

! Did the permit writer check the Part A to see what wastes the facility claimed to handle?

WP File Name: CH0304_C.MAN

List of Examples:

List of Attachments:

List of References:

CCR, Section 66261.126, Appendix VIII

List of Appendices: